



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 1 2011

REPLY TO THE ATTENTION OF:

AE-17J

Mr. Mike O'Donnell  
District Manager  
Waste Management  
Cleveland Hauling  
6705 Richmond Rd.  
Glenwillow, Ohio 44139

Re: Request for Exemption from Paint Stripping and  
Miscellaneous Surface Coating Operations Rule at  
Area Sources

Dear Mr. O'Donnell:

Thank you for your December 20, 2010 petition to the Environmental Protection Agency requesting an exemption from the motor vehicle and mobile equipment surface coating requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH ("MACT 6H"). Your request for exemption is in regard to the Cleveland Hauling facility located at 6705 Richmond Rd., Glenwillow, Ohio 44139

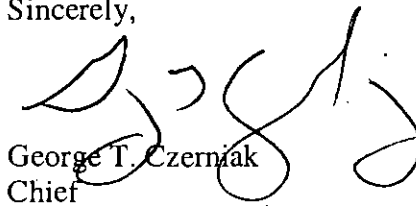
Eligibility for exemption from 40 CFR § 63.11170(a)(2) requires that you demonstrate, to the satisfaction of EPA, that you spray apply no coatings that contain the target hazardous air pollutants (HAP), as defined in §63.11180. The submitted petition must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. Based on information provided with the December 20, 2010 signed petition for exemption, including Material Safety Data Sheets from the Sheboygan Paint company, the Cleveland Hauling facility at the above referenced location is exempt from Subpart HHHHHH requirements for spray applied coatings. Note that other provisions of Subpart HHHHHH may continue to apply to your operation, e.g., provisions involving the use of methylene chloride.

Keep a record of this exemption on site at your facility for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that your facility intends to spray apply coatings containing any target HAP, the owner or operator must submit the initial notification required by 40 CFR § 63.11175 and comply with the requirements of this subpart.

This exemption is based on information that you have provided to EPA. Nothing in this exemption shall be construed as limiting the ability of EPA or delegated agencies to pursue enforcement action, if it is determined that your facility was not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. § 1001.

If you have any questions regarding this response, you may contact Jeffrey Bratko of my staff at (312) 886-6816.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Czerniak", is written over the typed name.

George T. Czerniak  
Chief

Air Enforcement and Compliance Assurance Branch

cc: Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, OH 43216-1049